

**CMR**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. 13-582</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: May 4, 2016</b>
<b>LEON LITTLE,</b> a/k/a "Bo," a/k/a "Lebo," a/k/a "Big Homey,"	<b>:</b>	<b>VIOLATIONS:</b> <b>21 U.S.C. § 846 (conspiracy to distribute controlled substances - 1 count)</b>
<b>COLISE HARMON,</b> a/k/a "Khali,"	<b>:</b>	<b>21 U.S.C. § 841(a)(1) (distribution of oxycodone - 24 counts)</b>
<b>BRENDIN STRAND</b>	<b>:</b>	<b>21 U.S.C. § 843(a)(3) (acquiring a controlled substance by fraud - 9 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 1957 (engaging in an unlawful monetary transaction – 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1956 (money laundering – 15 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
	<b>:</b>	<b>Notices of forfeiture</b>

**THIRD SUPERSEDING INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this Indictment:

**BACKGROUND**

1. The Controlled Substances Act governs the manufacture, distribution, and dispensing of controlled substances in the United States. Under the Controlled Substances Act, there are five schedules of controlled substances – Schedules I, II, III, IV, and V. Controlled substances are scheduled into these levels based upon their potential for abuse or dependence, among other things. Schedule I contains the most dangerous drugs that have the highest potential

for abuse or dependence, and Schedule V contains the least dangerous controlled substances.

2. Oxycodone is a narcotic analgesic that is similar to morphine and is classified as a Schedule II controlled substance, sometimes prescribed under the brand name Oxycontin. Oxycodone is used to treat severe pain, and, even if taken only in prescribed amounts, can cause physical and psychological dependence when taken for a long time. Oxycodone is used in pain relief drugs in varying strengths, including 5, 10, 30, 40, 60, and 80 milligram amounts. For example, Percocet is manufactured by numerous pharmaceutical companies under the following brand names: Endocet, Roxicet, Roxilox and Tylox. Percocet, which contains 10 milligrams of oxycodone, is used to treat moderate to moderately severe pain, and contains two drugs, oxycodone and acetaminophen. Even if taken only in prescribed amounts, pills containing amounts as low as 10 milligrams of oxycodone can cause physical and psychological dependence when taken for a long time.

### **THE CONSPIRACY**

3. From in or about July 2010 through in or about August 2012, in the Eastern District of Pennsylvania, defendants

**LEON LITTLE,  
a/k/a "Bo,"  
a/k/a "Lebo,"  
a/k/a "Big Homey,"  
COLISE HARMON,  
a/k/a "Khali," and  
BRENDIN STRAND**

conspired and agreed together with others known and unknown to the grand jury, to knowingly and intentionally distribute a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of

alprazolam, a Schedule IV controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C), (b)(2).

**MANNER AND MEANS**

It was part of the conspiracy that:

4. Defendant LEON LITTLE ran the LITTLE DRUG ORGANIZATION (LDO) that operated in Philadelphia, Pennsylvania and distributed oxycodone and alprazolam in Philadelphia, Pennsylvania and elsewhere.

5. The LDO recruited individuals known and unknown to the grand jury to pose as legitimate patients (hereinafter referred to as "pseudo-patient") and obtain prescriptions for controlled substances, specifically, pills containing oxycodone, a Schedule II controlled substance, and alprazolam, a Schedule IV controlled substance.

6. The LDO scheduled appointments for pseudo-patients at the medical office of L.B., a licensed physician known to the grand jury, located in Bala Cynwyd, Pennsylvania.

7. The LDO transported pseudo-patients to and/or from L.B.'s medical office and various pharmacies in Philadelphia, Pennsylvania so they could obtain oxycodone and alprazolam tablets.

8. The LDO paid the office visit charges at L.B.'s medical office and the costs for the prescriptions at the pharmacies for the pseudo-patients. The LDO also paid the pseudo-patients for obtaining and transferring the oxycodone and alprazolam tablets to LDO associates.

9. The LDO procured prescriptions for oxycodone using L.B.'s prescription pad and without L.B.'s consent. The LDO distributed the forged prescriptions to pseudo-patients

and paid the costs for the forged prescriptions at the pharmacies for the pseudo-patients. The LDO also paid the pseudo-patients for obtaining and transferring the oxycodone to LDO associates.

10. After collecting the pills from the pseudo-patients, the LDO counted and packaged the pills for redistribution and sold the pills to others.

11. Defendant LEON LITTLE was assisted in the operation of the LDO by the following conspirators, and others known and unknown to the grand jury:

a. Defendant COLISE HARMON, as well as James Alexander and John Baldwin, charged elsewhere, transported pseudo-patients to and/or from L.B.'s medical office and various pharmacies, provided money to pseudo-patients to pay for charges at L.B.'s medical office and the costs for the prescriptions at the pharmacies, and paid pseudo-patients for obtaining and transferring oxycodone and alprazolam tablets to the LDO. Defendant HARMON, as well as Alexander and Baldwin, also pretended to be a pseudo-patient and obtained oxycodone tablets through the use of prescriptions that they obtained from L.B. and others.

b. Heather Herzstein, charged elsewhere, scheduled appointments for pseudo-patients at the medical office of L.B. Herzstein also prepared prescriptions for oxycodone using L.B.'s prescription pad and without L.B.'s consent and distributed the forged prescriptions to the LDO. Herzstein falsely verified with pharmacies that the forged prescriptions received from LDO pseudo-patients were legitimate.

c. Defendant BRENDIN STRAND received oxycodone pills from defendant LEON LITTLE as well as from John Baldwin at the direction of defendant LITTLE. Defendant STRAND subsequently distributed the pills to customers, including customers in

Delaware. Defendant LITTLE provided the pills to defendant STRAND on consignment, which allowed defendant STRAND to pay defendant LITTLE with the drug proceeds from the sale of the pills.

12. Defendant LEON LITTLE paid defendant COLISE HARMON, Heather Herzstein, James Alexander, and John Baldwin, as well as others known and unknown to the grand jury, a fee for their participation in the scheduling, transportation and/or coordination of pseudo-patients.

13. Defendants LEON LITTLE, COLISE HARMON, BRENDIN STRAND, James Alexander, and John Baldwin, as well as others known and unknown to the grand jury, used residences to meet with each other, and to collect, process, store and/or distribute the narcotics and drug proceeds.

14. Defendants LEON LITTLE, COLISE HARMON, BRENDIN STRAND, Heather Herzstein, James Alexander, and John Baldwin, as well as others known and unknown to the grand jury, used telephones to communicate with each other regarding the scheduling, transportation and/or coordination of pseudo-patients, as well as the collection, processing, storing and/or distribution of oxycodone and drug proceeds.

#### OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants LEON LITTLE, COLISE HARMON, BRENDIN STRAND, and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania:

1. On or about the dates listed in the chart below, at various pharmacies throughout Philadelphia, defendant LEON LITTLE obtained oxycodone tablets, in the dosages

and quantities listed below, through the use of prescriptions that he obtained from L.B. and Heather Herzstein, each date constituting a separate overt act, and, after obtaining the oxycodone tablets, re-distributed the oxycodone tablets:

<i>Overt Act</i>	<i>Date</i>	<i>Rx Number</i>	<i>Dosage</i>	<i>Quantity</i>	<i>Location</i>
A	8/3/2010	N40292	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	8/3/2010	N40293	80 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
B	10/8/2010	2585328	10 mg	120	Philly Pharmacy, 210 Market Street
	10/8/2010	2585329	30 mg	120	Philly Pharmacy, 210 Market Street
C	11/1/2010	N47974	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	11/1/2010	N47973	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	11/1/2010	2586496	10 mg	120	Philly Pharmacy, 210 Market Street
	11/1/2010	2586495	30 mg	120	Philly Pharmacy, 210 Market Street
D	12/2/2010	550925	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	12/2/2010	550924	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
E	12/13/2010	N51764	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/13/2010	N51765	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
F	12/30/2010	N53272	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/30/2010	N53273	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/30/2010	554965	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	12/30/2010	554966	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.

G	1/27/2011	559366	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	1/27/2011	559367	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	1/27/2011	2591086	10 mg	120	Philly Pharmacy, 210 Market Street
	1/27/2011	2591085	30 mg	120	Philly Pharmacy, 210 Market Street
H	3/14/2011	N60371	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	3/14/2011	N60370	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	3/14/2011	566766	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	3/14/2011	566765	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
I	4/18/2011	572848	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	4/18/2011	572846	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.

2. On or about the dates listed in the chart below, at various pharmacies throughout Philadelphia, defendant COLISE HARMON obtained oxycodone tablets, in the dosages and quantities listed below, through the use of prescriptions that he obtained from L.B. and others, each date constituting a separate overt act, and, after obtaining the oxycodone tablets, distributed the oxycodone tablets to defendant LEON LITTLE or one of defendant LITTLE's workers for re-distribution:

<i>Overt Act</i>	<i>Date</i>	<i>Rx Number</i>	<i>Dosage</i>	<i>Quantity</i>	<i>Location</i>
A	8/10/2010	N40850	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	8/10/2010	N40849	80 mg	130	Northeast Pharmacy, 6730 Bustleton Ave.

B	10/11/2010	N46134	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	10/11/2010	N46133	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
C	11/1/2010	N47962	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	11/1/2010	N47963	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
D	11/2/2010	2586553	10 mg	120	Philly Pharmacy, 210 Market Street
	11/2/2010	2586552	30 mg	120	Philly Pharmacy, 210 Market Street
E	11/29/2010	2588085	10 mg	120	Philly Pharmacy, 210 Market Street
	11/29/2010	2588086	30 mg	120	Philly Pharmacy, 210 Market Street
F	11/30/2010	N50436	30 mg	135	Northeast Pharmacy, 6730 Bustleton Ave.
G	12/2/2010	N50637	10 mg	135	Northeast Pharmacy, 6730 Bustleton Ave.
H	12/8/2010	551742	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	12/8/2010	551741	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
I	12/27/2010	554563	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	12/27/2010	554564	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
J	12/28/2010	N53006	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/28/2010	N53005	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
K	12/29/2010	2589405	30 mg	120	Philly Pharmacy, 210 Market Street
L	1/24/2011	558953	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	1/24/2011	558952	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
M	1/25/2011	N55738	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	1/25/2011	N55737	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.

N	1/27/2011	2591079	10 mg	120	Philly Pharmacy, 210 Market Street
	1/27/2011	2591078	30 mg	120	Philly Pharmacy, 210 Market Street
O	2/25/2011	N58756	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	2/25/2011	N58757	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	2/25/2011	563980	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	2/25/2011	563979	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	2/25/2011	2592710	10 mg	120	Philly Pharmacy, 210 Market Street
	2/25/2011	2592709	30 mg	180	Philly Pharmacy, 210 Market Street

3. On or about the dates listed in the chart below, defendant LEON LITTLE obtained oxycodone tablets, in the dosages and quantities listed below, through the use of the forged prescriptions obtained from Heather Herzstein, with each date constituting a separate overt act:

<i>Overt Act</i>	<i>Date</i>	<i>Rx Number</i>	<i>Dosage</i>	<i>Quantity</i>	<i>Location</i>
A	11/1/2010	N47974	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	11/1/2010	N47973	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
B	12/13/2010	N51764	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/13/2010	N51765	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
C	12/30/2010	N53272	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/30/2010	N53273	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.

D	1/27/2011	2591086	10 mg	120	Philly Pharmacy, 210 Market Street
	1/27/2011	2591085	30 mg	120	Philly Pharmacy, 210 Market Street
E	3/14/2011	N60371	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	3/14/2011	N60370	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.

4. On or about the dates listed in the chart below, defendant COLISE HARMON obtained oxycodone tablets, in the dosages and quantities listed below, through the use of the forged prescriptions obtained from defendant LEON LITTLE and Heather Herzstein, with each date constituting a separate overt act:

Overt Act	Date	Rx Number	Dosage	Quantity	Location
A	11/2/2010	2586553	10 mg	120	Philly Pharmacy, 210 Market Street
	11/2/2010	2586552	30 mg	120	Philly Pharmacy, 210 Market Street
B	12/28/2010	N53006	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/28/2010	N53005	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
C	1/25/2011	N55738	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	1/25/2011	N55737	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
D	2/25/2011	N58756	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	2/25/2011	N58757	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.

5. On or about March 17, 2011, defendant BRENDIN STRAND drove to Philadelphia to receive oxycodone pills from the LDO. Defendant STRAND subsequently communicated with customers in text messages that he had oxycodone pills for sale.

6. On or about April 3, 2011, defendant BRENDIN STRAND drove to Philadelphia to receive oxycodone pills from the LDO. The next day, defendant STRAND communicated with customers in text messages that he had oxycodone pills for sale.

On or about May 9, 2011

7. At approximately 12:49 p.m., A.H, a person known to the grand jury, sent a text message to defendant BRENDIN STRAND stating, "I need more Jaws," meaning he needed a re-supply of oxycodone pills.

8. Between approximately 8:54 p.m. and 10:32 p.m., John Baldwin, at defendant LEON LITTLE's instruction, spoke to defendant BRENDIN STRAND by telephone to arrange a meeting location and time in Philadelphia to receive oxycodone pills from John Baldwin and provide cash to John Baldwin from the sale of oxycodone pills.

9. Shortly after approximately 10:32 p.m., at defendant LEON LITTLE's instruction, John Baldwin met with defendant BRENDIN STRAND to transfer oxycodone pills and receive cash from defendant STRAND.

10. On or about March 13, 2012, at the instruction of defendant LEON LITTLE, James Alexander met with John Baldwin to transfer narcotics obtained by pseudo-patients of the LDO who James Alexander had transported from L.B.'s medical office to a pharmacy.

On or about March 15, 2012:

11. At the instruction of defendant LEON LITTLE, James Alexander met with John Baldwin to transfer narcotics obtained by pseudo-patients of the LDO who James Alexander had transported from L.B.'s medical office to and from a pharmacy.

12. At the direction of defendant LEON LITTLE, James Alexander transferred to John Baldwin approximately 330 pills each containing 30 milligrams of oxycodone, a Schedule II narcotic, 160 pills each containing 10 milligrams of oxycodone, a Schedule II narcotic, and the pill bottles in the names of pseudo-patients Edward Jones and Anthony Minnick, charged elsewhere.

On or about April 2, 2012:

13. At the instruction of defendant LEON LITTLE, James Alexander met with John Baldwin to transfer narcotics obtained by pseudo-patients of the LDO who James Alexander had transported from L.B.'s medical office to and from a pharmacy.

14. James Alexander transferred to John Baldwin approximately 120 pills each containing 30 milligrams of oxycodone, a Schedule II narcotic, 120 pills each containing 10 milligrams of oxycodone, a Schedule II narcotic, and the pill bottles in the name of pseudo-patient Carla Trippett, charged elsewhere.

All in violation of Title 21, United States Code, Section 846.

**COUNTS TWO THROUGH TEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about each of the dates listed in the chart below, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**LEON LITTLE,  
a/k/a "Bo,"  
a/k/a "Lebo,"  
a/k/a "Big Homey,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, in the dosages and quantities specified below, with each date constituting a separate count:

<b><i>Count</i></b>	<b><i>Date</i></b>	<b><i>Rx Number</i></b>	<b><i>Dosage</i></b>	<b><i>Quantity</i></b>	<b><i>Location</i></b>
2	8/3/2010	N40292	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	8/3/2010	N40293	80 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
3	10/8/2010	2585328	10 mg	120	Philly Pharmacy, 210 Market Street
	10/8/2010	2585329	30 mg	120	Philly Pharmacy, 210 Market Street
4	11/1/2010	N47974	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	11/1/2010	N47973	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	11/1/2010	2586496	10 mg	120	Philly Pharmacy, 210 Market Street
	11/1/2010	2586495	30 mg	120	Philly Pharmacy, 210 Market Street
5	12/2/2010	550925	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	12/2/2010	550924	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.

6	12/13/2010	N51764	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/13/2010	N51765	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
7	12/30/2010	N53272	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/30/2010	554965	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	12/30/2010	N53273	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/30/2010	554966	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
8	1/27/2011	559366	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	1/27/2011	2591086	10 mg	120	Philly Pharmacy, 210 Market Street
	1/27/2011	559367	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	1/27/2011	2591085	30 mg	120	Philly Pharmacy, 210 Market Street
9	3/14/2011	N60371	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	3/14/2011	566766	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	3/14/2011	N60370	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	3/14/2011	566765	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
10	4/18/2011	572848	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	4/18/2011	572846	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.

All in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNTS ELEVEN THROUGH FIFTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about each of the dates listed in the chart below, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**LEON LITTLE,  
a/k/a "Bo,"  
a/k/a "Lebo,"  
a/k/a "Big Homey,"**

knowingly and intentionally acquired, and aided and abetted the acquisition of, oxycodone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, that is, defendant LITTLE presented, and aided and abetted the presentation of, fraudulent prescriptions for oxycodone tablets in the dosages and quantities specified below, which were created without the knowledge or permission of the physician to whom the prescriptions were attributed and signed with forgeries of the physician's signature, with each date constituting a separate count:

<b><i>Count</i></b>	<b><i>Date</i></b>	<b><i>Rx Number</i></b>	<b><i>Dosage</i></b>	<b><i>Quantity</i></b>	<b><i>Location</i></b>
11	11/1/2010	N47974	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	11/1/2010	N47973	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
12	12/13/2010	N51764	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/13/2010	N51765	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
13	12/30/2010	N53272	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/30/2010	N53273	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.

14	1/27/2011	2591086	10 mg	120	Philly Pharmacy, 210 Market Street
	1/27/2011	2591085	30 mg	120	Philly Pharmacy, 210 Market Street
15	3/14/2011	N60371	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	3/14/2011	N60370	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.

All in violation of Title 21, United States Code, Section 843(a)(3), and Title 18, United States Code, Section 2.

**COUNTS SIXTEEN THROUGH THIRTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about of the dates listed in the chart below, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**LEON LITTLE,  
a/k/a "Bo,"  
a/k/a "Lebo,"  
a/k/a "Big Homey," and  
COLISE HARMON,  
a/k/a "Khali,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, in the dosages and quantities specified below, with each date constituting a separate count:

<b><i>Count</i></b>	<b><i>Date</i></b>	<b><i>Rx Number</i></b>	<b><i>Dosage</i></b>	<b><i>Quantity</i></b>	<b><i>Location</i></b>
16	8/10/2010	N40850	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	8/10/2010	N40849	80 mg	130	Northeast Pharmacy, 6730 Bustleton Ave.
17	10/11/2010	N46134	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	10/11/2010	N46133	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
18	11/1/2010	N47962	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	11/1/2010	N47963	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
19	11/2/2010	2586553	10 mg	120	Philly Pharmacy, 210 Market Street
	11/2/2010	2586552	30 mg	120	Philly Pharmacy, 210 Market Street

20	11/29/2010	2588085	10 mg	120	Philly Pharmacy, 210 Market Street
	11/29/2010	2588086	30 mg	120	Philly Pharmacy, 210 Market Street
21	11/30/2010	N50436	30 mg	135	Northeast Pharmacy, 6730 Bustleton Ave.
22	12/2/2010	N50637	10 mg	135	Northeast Pharmacy, 6730 Bustleton Ave.
23	12/8/2010	551742	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	12/8/2010	551741	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
24	12/27/2010	554563	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	12/27/2010	554564	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
25	12/28/2010	N53006	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/28/2010	N53005	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
26	12/29/2010	2589405	30 mg	120	Philly Pharmacy, 210 Market Street
27	1/24/2011	558953	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	1/24/2011	558952	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
28	1/25/2011	N55738	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	1/25/2011	N55737	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
29	1/27/2011	2591079	10 mg	120	Philly Pharmacy, 210 Market Street
	1/27/2011	2591078	30 mg	120	Philly Pharmacy, 210 Market Street

30	2/25/2011	N58756	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	2/25/2011	N58757	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	2/25/2011	563980	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	2/25/2011	563979	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	2/25/2011	2592710	10 mg	120	Philly Pharmacy, 210 Market Street
	2/25/2011	2592709	30 mg	180	Philly Pharmacy, 210 Market Street

All in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and  
 Title 18, United States Code, Section 2.

**COUNTS THIRTY-ONE THROUGH THIRTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about each of the dates listed in the chart below, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**LEON LITTLE,  
a/k/a "Bo,"  
a/k/a "Lebo,"  
a/k/a "Big Homey," and  
COLISE HARMON,**

knowingly and intentionally acquired, and aided and abetted the acquisition of, oxycodone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, that is, defendants LITTLE and HARMON presented, and aided and abetted the presentation of, fraudulent prescriptions for oxycodone tablets in the dosages and quantities specified below, which were created without the knowledge or permission of the physician to whom the prescriptions were attributed and signed with forgeries of the physician's signature, with each date constituting a separate count:

<i>Count</i>	<i>Date</i>	<i>Rx Number</i>	<i>Dosage</i>	<i>Quantity</i>	<i>Location</i>
31	11/2/2010	2586553	10 mg	120	Philly Pharmacy, 210 Market Street
	11/2/2010	2586552	30 mg	120	Philly Pharmacy, 210 Market Street
32	12/28/2010	N53006	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/28/2010	N53005	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
33	1/25/2011	N55738	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	1/25/2011	N55737	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.

34	2/25/2011	N58756	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	2/25/2011	N58757	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.

All in violation of Title 21, United States Code, Section 843(a)(3), and Title 18, United States Code, Section 2.

**COUNT THIRTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 18, 2011, in Bensalem, in the Eastern District of Pennsylvania, defendant

**LEON LITTLE,  
a/k/a "Bo,"  
a/k/a "Lebo,"  
a/k/a "Big Homey,"**

knowingly engaged in, and aided, abetted and willfully caused, a monetary transaction affecting interstate commerce in criminally derived property of a value greater than \$10,000, that is the purchase of a 2010 Can-Am Spyder, VIN: 2BXJAKA18AV000122, for \$15,548.46 from East Coast Cycle Center, and such property was derived from a specified unlawful activity, that is, drug trafficking, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Sections 1957 and 2.

**COUNTS THIRTY-SIX THROUGH FIFTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about the dates set forth below, in the Eastern District of Pennsylvania, defendant

**LEON LITTLE,  
a/k/a "Bo,"  
a/k/a "Lebo,"  
a/k/a "Big Homey,"**

knowingly conducted, and aided, abetted and willfully caused, the following financial transactions affecting interstate commerce, with each transaction constituting a separate count:

<u>Count</u>	<u>Date</u>	<u>Financial Institution</u>	<u>Description</u>	<u>Account Number Ending</u>
36	November 17, 2011	Beneficial Bank, Philadelphia	\$9,000 cash deposit and issuance of \$9,000 check	2825
37	November 17, 2011	TD Bank, Philadelphia	\$9,000 check deposit	6160
38	November 17, 2011	Citizen's Bank, Philadelphia	\$9,000 cash deposit and issuance of \$9,000 check	1141
39	November 17, 2011	TD Bank, Philadelphia	\$9,000 check deposit	6152
40	November 17, 2011	Boeing Helicopter Credit Union, Ridley	\$26,970 cash deposit and issuance of \$27,000 check	0966
41	November 17, 2011	Bank of America, Philadelphia	\$10,000 cash deposit	7338
42	November 17, 2011	Bank of America, Philadelphia	\$10,000 cash deposit	8994
43	November 18, 2011	Bank of America, Philadelphia	\$10,000 cash deposit	7338
44	November 18, 2011	Bank of America, Philadelphia	\$10,000 cash deposit	8994

<u>Count</u>	<u>Date</u>	<u>Financial Institution</u>	<u>Description</u>	<u>Account Number Ending</u>
45	November 21, 2011	Bank of America, Philadelphia	\$20,000 transfer	8994
46	November 21, 2011	Bank of America, Philadelphia	\$40,000 check deposit	3134
47	November 22, 2011	Beneficial Bank, Philadelphia	\$9,000 check deposit	2825
48	November 22, 2011	Beneficial Bank, Philadelphia	\$5,040 check deposit	2825
49	November 22, 2011	Bank of America, Philadelphia	\$27,000 check deposit	3134
50	November 30, 2011	Bank of America, Philadelphia	\$14,000 check deposit	3354

2. When conducting, and aiding, abetting and willfully causing, the financial transactions described in paragraph 1 above, defendant LEON LITTLE knew that the property involved in those financial transactions represented the proceeds of some form of unlawful activity.

3. The financial transactions described in paragraph 1 above involved the proceeds of a specified unlawful activity, that is, drug trafficking, in violation of Title 21, United States Code, Section 841(a)(1), and defendant LEON LITTLE acted knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

**NOTICE OF FORFEITURE #1**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 21, United States Code, Sections 846, 841(a)(1) and 843(a)(3), set forth in this superseding indictment, defendants

**LEON LITTLE,  
a/k/a "Bo,"  
a/k/a "Lebo,"  
a/k/a "Big Homey,"  
COLISE HARMON,  
a/k/a "Khali," and  
BRENDIN STRAND**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses, including, but not limited to, \$9,700; and

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to:

- (1) \$3,004,147.50,
- (2) a 2010 Can-Am Spyder, VIN: 2BXJAKA18AV000122,
- (3) a 2011 Dodge Ram 1500, VIN: 1D7RV1CT5BS603222,

and

- (4) a 2001 Nissan Xterra, VIN: 5N1ED28Y01C502972.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or  
(e) has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

**NOTICE OF FORFEITURE #2**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Sections 1956 and 1957, set forth in this superseding indictment, defendant

**LEON LITTLE,  
a/k/a "Bo,"  
a/k/a "Lebo,"  
a/k/a "Big Homey,"**

shall forfeit to the United States of America any and all property involved in such offense, and any property traceable to such property, including, but not limited to:

- (a) \$15,548.46,
- (b) \$9,000,
- (c) \$9,000,
- (d) \$26,970,
- (e) \$10,000,
- (f) \$10,000,
- (g) \$10,000, and
- (h) \$10,000.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982.

**A TRUE BILL:**

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**FOREPERSON**

*Zane David Memeger*  
**ZANE DAVID MEMEGER**  
**United States Attorney**